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SCOTT ELLIOTT

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October 12, 2017

VIA E-FILING

Ms. Jocelyn Boyd Chief Clerk of the Commission SC Public Service Commission P. O. Drawer 11649 Columbia, SC 29211

RE:

Request of the South Carolina Office of Regulatory Staff For Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-290 Docket No. 2017-305-E

Dear Ms. Boyd:

Enclosed please find for filing a Petition to Intervene filed on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk

Enclosure

cc: A

All parties of record (w/encl.)

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-305-E

IN THE MATTER OF:)	
)	
Request of the South Carolina Office of)	
Regulatory Staff for Rate Relief to)	PETITION TO INTERVENE
SCE&G Rates Pursuant to)	
S.C. Code Ann. § 58-27-920)	

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

- 1. That on September 26, 2017, the South Carolina Office of Regulatory Staff ("ORS") filed a Request for Rate Relief, asking the Commission to order South Carolina Electric & Gas ("SCE&G") to immediately suspend all revised rates collection from its customers, and further, if the Base Load Review Act ("BLRA") is amended, repealed or declared unconstitutional, to order SCE&G to cease and desist from collecting revised rates and to refund to its customers all money collected under the revised rates provisions of the BLRA.
- 2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.
- 3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.

- 4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.
- 5. That the relief requested by the ORS in this docket is in the public interest and therefore, SCEUC will appear to support the ORS request for rate relief.
- 6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
 - 7. That Petitioner is represented by counsel in this proceeding as follows:

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WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

c. For such other and further relief as is just and proper.

Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street Columbia, SC 29201 (803) 771-0555

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina

October 12, 2017

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Request of South Carolina Office of Regulatory Staff for

Rate Relief to SCE&G Rates Pursuant to

S.C. Code Ann. § 58-27-920

Docket No.:

2017-305-E

PARTIES SERVED:

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Shannon Bowyer Hudson, Esquire	Matthew W. Gissendanner, Esquire
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Columbia, SC 29205	Columbia, SC 29212

PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA

ENERGY USERS COMMITTEE

October 12, 2017

Linda B. Kitchens, Paralegal ELLIOTT & ELLIOTT, P.A.

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